UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

JUMPSTART COMMUNICATIONS LLC,	)	
	)	
Plaintiff,	)	
	)	Magistrate Judge Susan L. Collins
vs.	)	
	)	Case No. 1:24-cv-00447
RYAN V. JUMPER and	)	
THE JUMPER GROUP LLC F/K/A	)	
JUMPSTART COMMUNICATION LLC,	)	
	)	
Defendants.	)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDERS
AND FED. R. EVID. 502(d) ORDER

Pursuant to Fed. R. Civ. P. 26(c), Plaintiff Jumpstart Communications, LLC ("Plaintiff"
or "Jumpstart Communications"), and Defendants Ryan V. Jumper and The Jumper Group LLC
f/k/a Jumpstart Communication, LLC ("Defendants"), by and through counsel, jointly move the
Court to enter the parties' proposed Stipulated Protective Order (Exhibit 1) and Fed. R. Evid.
502(d) Order (Exhibit 2).

The parties' proposed Stipulated Protective Order is drawn from the United States
District Court for the Northern District of Indiana's model confidentiality order, and consistent
with Seventh Circuit precedent, the parties seek confidentiality protections for _only_ the following
limited and identifiable documents and information:

      1.   Jumpstart Communications' and The Jumper Group LLC f/k/a
Jumpstart Communication, LLC's financial information including, but not limited
to, income statements, profit and loss statements, and balance sheets;

        2.   Jumpstart Communications' and The Jumper Group LLC f/k/a Jumpstart Communication, LLC's customer lists or other documents and communications reflecting the identity of their actual or prospective customers;

        3.   The terms of any contract between Jumpstart Communications and/or The Jumper Group LLC f/k/a Jumpstart Communication, LLC, on one hand, and any actual or prospective customer, on the other, and any documents and communications regarding the same.

Consistent with the requirement of Fed. R. Civ. P. 26(c), the parties' Motion is supported by good cause. The parties have a legitimate business interest in maintaining the confidentiality of their financial information including their profits, losses, margins, etc.—information that is not available to the public or widely known within their organizations. Similarly, the parties have a legitimate business interest in protecting their customer lists (or other documents and communications reflecting the identity of their actual or prospective customers) and the terms of any contracts entered into with their customers or prospective customers, as competitors would likely use that competitive information to undercut their business. Further, certain customer contracts contain confidentiality provisions. Finally, the parties seek to enter into a Fed. R. Evid. 502(d) Order to protect the parties against any waiver of the privileges or protections that might otherwise arise from the disclosure of privileged material.

Accordingly, the parties respectfully request the Court enter the parties' proposed Stipulated Protective Order (Exhibit 1) and Fed. R. Evid. 502(d) Order (Exhibit 2).

Respectfully submitted,

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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on February 5, 2025, a true and accurate copy of the foregoing document was electronically filed with the Court and served via the Court's CM/ECF filing system on the following parties:

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                                        /s/ Carrie E. Sheridan